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SSIC NO. 5090.3.A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

21 March 2005

Mr. F. Andrew Piszkin
BRAC Environmental Coordinator
Base Realignment and Closure
7040 Trabuco Road
Irvine, California 92618

Subject: Draft Work Plan for Landfill Cover Test Fill Construction, Operable Unit 2B, IRP
Sites 2 and 17, Former Marine Corps Air Station, El Toro, California

Mr. Pizskin:

The U.S. Environmental Protection Agency (EPA) has completed its review of the subject draft work plan dated March 2005. We are providing the attached comments for your consideration.

If you should have any questions/concerns, please contact me at 415-972-3349.

Sincerely,

A handwritten signature in cursive script that reads "Rich Muza".

Rich Muza, RPM
Superfund Division

cc. Gordon Brown, NFECSW SDIEGO
Content Arnold, NFECSW SDIEGO
Frank Cheng, DTSC
John Broderick, RWQCB
Bob Woodings, RAB
Marcia Rudolph, RAB

received
3/28/03

of the specific standard proposed/used. For example, the citation in the text for the Particle Size Distribution method is ASTM D422, but it would be preferable to cite ASTM D422-63(2002) since ASTM D422-63(1998) is outdated. As another example, for water content, the current ASTM standard is ASTM D3017-04 while ASTM D3017-01 and ASTM D3017-96e1 are outdated. Where appropriate, it is recommended that the Draft Work Plan be revised to provide current and specific reference citations.

SPECIFIC COMMENTS

1. **Section 2.2.1, Soil Availability and Options, Page 2-1:** The last paragraph on page 2-1 indicates 275,000 cubic yards of clay are available as well as 175,000 cubic yards of sand which would be mixed to make approximately 350,000 cubic yards of ET cover material. There appears to be a miscalculation in the above information as the total adds up to 450,000 cubic yards. It is recommended that the Draft Work Plan be revised to correct this apparent discrepancy.
2. **Section 3.2, Remaining Lifts on the Entire Four Feet of Fill, Page 3-1:** This section lists certain responsibilities of the quality assurance monitor (QAM); however, little detail is provided in this section or other sections in the text as to how the QAM will perform their duties. For example, the QAM is to verify that there is a competent bond between layers while little detail is provided about what this entails. (It is noted that Section 4 provides some discussion regarding these tasks, but only limited detail is provided.) It is recommended that the Draft Work Plan include additional detail and/or specific procedures which the QAM will follow in conducting their required duties.